

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

HAO-KANG CHING,	)	CASE NO. 1:01CV2230
	)	
Plaintiff,	)	JUDGE WELLS
	)	
-v-	)	
	)	
THE CLEVELAND INSTITUTE OF MUSIC, et al.,	)	<b>MOTION FOR LEAVE TO FILE FIRST AMENDED ANSWER OF DEFENDANT CLEVELAND INSTITUTE OF MUSIC INSTANTER</b>
	)	
Defendants.	)	

Now comes defendant Cleveland Institute of Music, by and through counsel, and moves pursuant to Federal Rule of Civil Procedure 15 for leave to file its attached First Amended Answer. In this answer defendant does not obliterate any previous admissions but rather amends its previous answer to refine certain responses to allegations and to include additional affirmative defenses. Plaintiff respectfully suggests good cause exists for granting this motion.

If this Court grants defendant's motion, defendant seeks that its First Amended Answer be considered automatically filed with this Court.

Respectfully submitted,

/s/ Jennifer Welfley Nohra  
Bruce G. Hearey (0009087)  
Jennifer Welfley Nohra (0067974)  
SPIETH, BELL, McCURDY & NEWELL CO., LPA  
925 Euclid Ave., Ste. 2000  
Cleveland, Ohio 44115  
Ph: (216) 696-4700  
Fax: (216) 696-2706  
[bhearey@spiethbell.com](mailto:bhearey@spiethbell.com)  
[jnohra@spiethbell.com](mailto:jnohra@spiethbell.com)  
Attorneys for Defendant  
Cleveland Institute of Music



**CERTIFICATE OF SERVICE**

A copy of the foregoing Motion for Leave to File First Amended Answer of Defendant Cleveland Institute of Music Instanter along with the attached First Amended Answer of Defendant Cleveland Institute of Music was electronically filed and also served by regular U.S. mail this 17th day of October, 2001, to:

Eric Norton, Esquire  
The Chapman Law Firm Co., LPA  
The Marion Building, Ste. 100  
1276 West Third Street  
Cleveland, Ohio 44113

Attorney for Plaintiff

and

Thomas Simmons, Esq.  
Arter & Hadden  
925 Euclid Ave., Ste. 1100  
Cleveland, Ohio 44115

Attorney for Defendant  
Bruce McInnes

\_\_\_\_\_  
/s/ Jennifer Welfley Nohra  
Bruce G. Hearey (0009087)  
Jennifer Welfley Nohra (0067974)  
SPIETH, BELL, McCURDY  
& NEWELL CO., L.P.A.  
925 Euclid Ave., Ste. 2000  
Cleveland, Ohio 44115  
Ph: (216) 696-4700  
Fax: (216) 696-2706  
[bhearey@spiethbell.com](mailto:bhearey@spiethbell.com)  
[jnohra@spiethbell.com](mailto:jnohra@spiethbell.com)

Attorneys for Defendant  
Cleveland Institute of Music